REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-3, 5-7, 9-11, 13-15, 17-19, 21-23, 25-30, 32, and 33 are pending in the present application, Claims 1, 9, and 17 having been amended, and Claims 31 and 35 having been canceled without prejudice or disclaimer. Support for the amendments to Claims 1, 9, and 17 is found, for example, Figs. 12A and 12B, and their corresponding descriptions in the specification. Applicants respectfully submit that no new matter is added.

In the outstanding Office Action, Claim 1, 9, and 17 were rejected under 35 U.S.C. §112, first paragraph; Claim 1, 9, 17, and 29-35 were rejected under 35 U.S.C. §102(b) as anticipated by Linden et al. (*ALCHEMIST: A General Purpose Transformation Generator*, published June 1996, publishes: software-practice and experience, pages 653-675, hereinafter Linden); and Claims 2, 3, 5-7, 10, 11, 13-15, 18, 19, 21-23, and 25-27 were rejected under 35 U.S.C. §103(a) as unpatentable over Linden in view of Rada et al. (*Hypertext Interchange Using ICA*, June 1995, pages 99-117, hereinafter Rada).

With respect to the rejection of Claims 1, 9, and 17 under 35 U.S.C. §112, first paragraph, the language objected to by the Office is removed from the claims. Accordingly, this ground of rejection is overcome.

With respect to the rejection of Claim 1 as anticipated by Linden, Applicants respectfully submit that the amendment to Claim 1 overcomes this ground of rejection. Amended Claim 1 recites, *inter alia*,

> displaying a first list of elements in the first structural description in the graphical user interface;
>
> displaying a second list of elements in the second structural description in the graphical user interface with an additional element for no corresponding element; [and]

> inputting, into the map editor by a user with the
> graphical user interface, preferences for transforming an
> element in the first list to one of no corresponding element,
> one corresponding element or multiple corresponding
> elements of the second list by choosing elements in the
> second list.

Linden does not disclose or suggest every element of amended Claim 1.

Linden is directed to a general purpose transformation generating environment that supports the specification, generation, and execution of data transforms. In particular, Linden is directed to a program called ALCHEMIST that allows an abstract specification of the transformation through a window-based interface and supports the generation and compilation of transformation program code from the specification. In particular, Linden describes that ALCHEMIST is based on the idea that the user defines a syntactic structure of the data representations and the related structure associations using a grammar notation, and that such specification defines the way to transform source parse tree structures into target parse tree structures.[1] Further, Linden discloses that building a new "spell" requires a certain amount of expertise in defining the grammars and the mapping. The ALCHEMIST user must have some knowledge about context-free grammars, LR parsing, and a basic understanding of the underlying concepts of TT-grammars.[2]

In particular, Applicants note that Linden requires layers of intermediate processing as well as expertise in defining grammars such as context-free grammars and TT grammars. Further, Linden is silent regarding the displaying a first list of elements in the first structural description, and displaying a second list of elements in the second structural description, as recited in Claim 1.

Applicants respectfully submit that Linden fails to disclose:

> displaying a first list of elements in the first
> structural description in the graphical user interface; [and]

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[1] See page 655 of Linden.
[2] See page s 658-659, for example, of Linden.

> displaying a second list of elements in the second
> structural description in the graphical user interface with an
> additional element for no corresponding element,

as recited in amended Claim 1.

Fig. 1 of <u>Linden</u> on page 656 shows the ALCHEMIST interface. While some information is displayed on this interface, there is not disclosure or suggestion that this interface includes "a first list of elements in the first structural description in the graphical user interface" and "a second list of elements in the second structural description in the graphical user interface with an additional element for no corresponding element." Furthermore, there is no disclosure or suggestion that the interface on page 656 of <u>Linden</u> is used to input "into the map editor by a user with the graphical user interface, preferences for transforming an element in the first list to one of no corresponding element, one corresponding element or multiple corresponding elements of the second list by choosing elements in the second list."

Further, Applicants respectfully submit that <u>Linden</u> fails to disclose the step of "inputting, into the map editor by a user with the graphical user interface, preferences for transforming an element in the first list to one of no corresponding element, one corresponding element or multiple corresponding elements of the second list by choosing elements in the second list," as recited in amended Claim 1. The general description of SPELLBOUND, the user interface of <u>Linden</u> to specify "spells," does not disclose the above-noted imputing step.

<u>Rada</u> is directed to the Integrated Chameleon Architecture (ICA), which is a public domain toolset for generating translators for translating text and hypertext between various systems. In particular, <u>Rada</u> describes an "extended" ICA that is based on ICA, with extra pre- and post-processors to handle context sensitive and implicit information of hypertext. In

particular, <u>Rada</u> describes that the general method of information exchange is to use an

intermediate format through which data in one format passes on its way to another format.

However, Applicants respectfully submit that <u>Rada</u> fails to disclose:

>displaying a first list of elements in the first
>structural description in the graphical user interface; [and]

>displaying a second list of elements in the second
>structural description in the graphical user interface with an
>additional element for no corresponding element,

as recited in amended Claim 1.

Further, Applicants respectfully submit that <u>Rada</u> fails to disclose the step of

"inputting, into the map editor by a user with the graphical user interface, preferences for

transforming an element in the first list to one of no corresponding element, one

corresponding element or multiple corresponding elements of the second list by choosing

elements in the second list," as recited in amended Claim 1.

Thus, no matter how the teachings of <u>Rada</u> and <u>Linden</u> are combined, the combination

does not teach or suggest the steps of "displaying" and "inputting" as recited in Claim 1.

Accordingly, Applicants respectfully submit that the rejection of Claim 1 is rendered moot

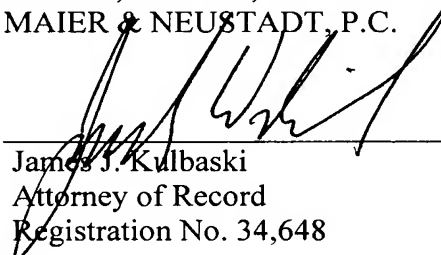and that Claim 1 patentably defines over any proper combination of the cited references.

In view of the above-noted distinctions, Applicants respectfully submit that Claim 1

(and any claims dependent thereon) patentably distinguish over <u>Rada</u> and <u>Linden</u>, taken alone

or in proper combination.

In addition, Claims 9 and 17 recite elements analogous to those of Claim 1. Thus,

Applicants respectfully submit that Claims 9 and 17 (and any claims dependent thereon)

patentably distinguish over <u>Linden</u> and <u>Rada</u>, taken alone or in proper combination.

Consequently, in light of the above discussion and in view of the present amendment, the present application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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